

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

THE STATE OF MISSOURI,)
ex rel. ERIC S. SCHMITT, in his official)
capacity as Missouri Attorney General,)
Plaintiff,)

v.)

THE PEOPLE’S REPUBLIC OF CHINA,)
THE COMMUNIST PARTY OF CHINA,)
NATIONAL HEALTH COMMISSION)
OF THE PEOPLE’S REPUBLIC OF)
CHINA, MINISTRY OF EMERGENCY)
MANAGEMENT OF THE PEOPLE’S)
REPUBLIC OF CHINA, MINISTER OF)
CIVIL AFFAIRS OF THE PEOPLE’S)
REPUBLIC OF CHINA, PEOPLE’S)
GOVERNMENT OF HUBEI)
PROVINCE, PEOPLE’S GOVERNMENT)
OF WUHAN CITY, WUHAN INSTITUTE)
OF VIROLOGY, AND CHINESE)
ACADEMY OF SCIENCES,)
Defendants.)

Case No.: 1:20-cv-00099-SNLJ

**MOTION OF LAWYERS FOR UPHOLDING INTERNATIONAL LAW FOR
LEAVE TO FILE *AMICUS CURIAE* BRIEF IN OPPOSITION TO PLAINTIFF
THE STATE OF MISSOURI’S COMPLAINT AGAINST DEFENDANTS
THE PEOPLE’S REPUBLIC OF CHINA, *ET AL.***

The Lawyers for Upholding International Law (hereinafter “Proposed *Amici*”) respectfully move this Court for leave to file the attached *Amicus Curiae* Brief in Opposition to Plaintiff The State of Missouri’s Complaint against Defendants The People’s Republic of China, *et al.* As argued more fully in the Brief, Proposed *Amici* respectfully request that this Court dismiss Plaintiff’s Complaint *sua sponte*.

Movants consist of Professor Geert-Jan Alexander Knoops and Professor Tom Zwart. Professor Knoops and Professor Zwart are international law scholars at various institutions and are leading experts in the field of international law. They each have an extensive academic and professional background in their respective field.

As stated in the accompanying Memorandum of Law in Support of the Motion for Leave to File *Amicus Curiae* Brief, Proposed *Amici* are uniquely qualified to offer the Court detailed analysis on the issues of international law, specifically the sovereign immunity of China, and the severe deficiencies of Plaintiff The State of Missouri's Complaint as well as the potential ramifications on international legal matters. The analysis contained in the Brief exhibits the multitude of reasons this Court could consider to dismiss Plaintiff's Complaint *sua sponte*. Moreover, this *amicus* brief is timely in that it provides arguments for the Court to consider the dismissal of Plaintiff's Complaint early on in the litigation before the Court goes into the substance of the case.

For these reasons, which are more fully stated in the accompanying Memorandum of Law, The Lawyers for Upholding International Law respectfully request that this Court grant this Motion for Leave to File the attached *amicus curiae* brief.

Dated: September 25, 2020

Respectfully submitted,

THE SIMON LAW FIRM, P.C.

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Lawyers for Upholding International Law

CERTIFICATE OF SERVICE

I certify that on this day, I filed the foregoing **Motion for Leave to File the *Amicus Curiae* Brief of Group of Experts in International Law in Opposition to Plaintiff The State of Missouri's Complaint against Defendants The People's Republic of China, et al.** with the clerk's office via the CM/ECF system, which will send notification of filing to the following counsel of record:

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